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7			
,	UNITED STATES I	DISTRICT COURT	
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
	Nikkei Global, Inc., a California corporation,	CASE NO.: 2:18-cv-02013-JCM-EJY	
10	Trimer eroom, mor, a common corporation,	2110 21 02010 0011 201	
11	Plaintiff,	CONTRACT A STAND OF THE	
11	VS.	STIPULATION AND ORDER [PROPOSED] REGARDING	
12		EXTENSIONS OF TIME:	
10	Co-Partner Consortium ("Partner-CO"), a		
13	Nevada general partnership associated in fact	(1) TO FILE RESPONSE AND REPLY TO	
14	and as an enterprise per 18 USCA § 1961(3); Mr. Phillip Ziade, Nevada resident and co-	MOTION TO DISMISS [ECF No. 70]; And	
	partner; Mr. Jude E. Nassar, an individual	(2) TO MAKE INITIAL DISCLOSURES	
15	resident of Clark County, Nevada; Appleton	PURSUANT TO JOINT DISCOVERY	
1.6	Properties, LLC, a Nevada limited liability	PLAN [ECF No. 71]	
16	company; Z Leb Group, LLC, a Nevada		
17	limited liability company; Progressive Construction, Inc. a/k/a Growth Construction,		
	a Nevada corporation; Growth Development,		
18	LLC a/k/a Growth Construction, a Nevada		
19	limited liability company, Vibrant Realty,		
19	LLC, a Nevada limited liability company; AJ Properties International, LLC, a/k/a AJ1, a		
20	Nevada limited liability company; AJ		
	Properties International Series 2 LLC, a/k/a		
21	AJ2, a Nevada limited liability company;		
22	Growth Holdings, a Nevada corporation;		
22	Growth Luxury Homes, LLC, a/k/a GLH, a Nevada limited liability company; Growth		
23	Luxury Realty, LLC, a/k/a GLR, a Nevada		
2.4	limited liability company; Mr. Yoshimi		
24	Hirooka, a resident of Japan or Singapore,		
25	doing business in Nevada; Mr. Yoshihiro		
	Hirooka, a resident of Japan or Singapore doing business in Nevada; Hirooka Family		
26	Office, Ltd., a foreign organization doing		
27	business in Nevada,		
27	Defendants		
	Defendants.		

STIPULATION AND [PROPOSED] ORDER

Plaintiff Nikkei Global Inc. ("NGI"), and Defendants Phillippe Ziade, Jude Nassar, Appleton Properties, LLC, Z Leb Group, LLC, Progressive Construction, Inc., Growth Development, LLC, Vibrant Realty, LLC, AJ Properties International, LLC, AJ Properties International Series 2, LLC, Growth Holdings, LLC, Growth Luxury Homes LLC, and Growth Luxury Realty, LLC (collectively, the "Ziade Defendants"), by and through their undersigned respective counsel, submit the following Stipulation for the Court's review and approval.

1. ZIADE DEFENDANTS' NEW MOTION TO DISMISS [ECF No. 70]

On October 28, 2019, following this Court's dismissal of some but not all of Plaintiff NGI's claims (*see* Order, ECF No. 68), the Ziade Defendants filed another Motion to Dismiss the remainder of Plaintiff NGI's First Amended Complaint, this time on purely jurisdictional grounds. *See* ECF No. 70. The original deadline for NGI to file its Response to the Ziade Defendants' new Motion to Dismiss was November 11, 2019. *See* LR 7-2(b). Prior to that date, however, NGI requested additional time to prepare and file its Response, and the Ziade Defendants agreed to such request. The Parties agreed that the new deadline should be November 25, 2019. The Parties also agreed that the new deadline for Ziade Defendants' for their Reply is December 13, 2019.

2. THE PARTIES' INITIAL DISCLOSURES

On October 25, 2019, the Parties submitted their proposed Joint Discovery Plan for this Court's approval. *See* ECF No. 69. On October 30, 2019, this Court approved that originally submitted plan. *See* ECF No. 71. The Parties have subsequently agreed, however, that the date for initial disclosures should be extended to December 9, 2019. All other dates in the Plan remain the same and are unaffected by this Stipulation to extend the initial disclosure date.

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1	As such, the Parties stipulate as follows:		
2	(1) Plaintiff NGI shall have until and through November 25, 2019 to file its Response to		
3	the Ziade Defendants' new and pending Motion to Dismiss [ECF No. 70];		
4	(2) Ziade Defendants' shall have until and through December 13, 2019 to file its Reply		
5	to NGI's Response to the Ziade Defendants' new and pending Motion to Dismiss [ECF No. 70];		
6	(3) The Parties shall have until and through December 9, 2019, to make their initia		
7	disclosures (with no other dates in the Plan being changed at this time).		
8			
9	DATED: November 14, 2019		
10	FENNEMORE CRAIG, P.C.	BAILEY KENNEDY	
11	D //D: 1 1D :/		
12	By: /s/ Richard Dreitzer Richard Dreitzer, Esq., NV Bar No. 6626	By: <u>/s/ Joseph Liebman</u> Joseph A. Liebman, Esq., NV Bar No. 10125	
13	Daniel S. Cereghino, Esq., NV Bar No. 11534 300 S. Fourth St., Suite 1400	8984 Spanish Ridge Ave., Suite 420 Las Vegas, NV 89148	
14	Las Vegas, Nevada 89101	jliebman@baileykennedy.com	
15	rdreizter@fclaw.com; dcereghino@fclaw.com Attorneys for Plaintiff	LAW OFFICE OF MICHAEL LATER	
16		Michael M. Later, Esq., NV Bar No. 7416 8890 Spanish Ridge Ave.	
17		Las Vegas, NV 89148	
		michael@mlaterlaw.com	
18		Attorneys for the Growth Defendants	
19			
20	OR	<u>DER</u>	
21	IT ·	IS SO ORDERED.	
22	2) P O	
23	UNITED STATES MAGISTRATE JUDGE		
24	DA	DATED: November 21, 2019	
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